

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**SUMMONS**-----X
TARSHA TARRY

Plaintiff,

-against-

WORLD HEADQUARTERS OF JEHOVAH'S
WITNESSES and KINGDOM HALL OF JEHOVAH'S
WITNESSESDefendants.
-----XPlaintiff(s) designate
KINGS County as the place of
trial.The basis of the venue is
Situs of AccidentPlaintiff(s) reside at
290 Stone Avenue,
Brooklyn, NY 11212Index No.:
Date Summons &
Complaint Filed:**To the above named Defendant(s)**

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the services of this summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Port Washington, NY
September 12, 2019By: 

Brett A. Zekowski

Parker Waichman LLP*Office & Post Office Address:*

6 Harbor Park Drive

Port Washington, NY 11050

(516) 466-6500

Our File # 9006951

TO:

World Headquarters of Jehovah's Witnesses
1 Kings Drive
Tuxedo Park, NY 10987Kingdom Hall of Jehovah's Witnesses
777 Albany Ave
Brooklyn, New York 11203

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
TARSHA TARRY

Plaintiff,

-against-

WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES
and KINGDOM HALL OF JEHOVAH'S WITNESSES

Defendants.

-----X

VERIFIED COMPLAINT

Index No.:
Jury Trial Demanded

Plaintiff, TARSHA TARRY, by her attorneys Parker Waichman LLP, complaining of the defendants, respectfully alleges, on personal knowledge as to himself and on information and belief as to all other matters, as follows:

1. At the time of the commencement of this action plaintiff, TARSHA TARRY, was a resident of the County of Kings, State of New York.
2. At the time of the incident(s) giving rise to this complaint, plaintiff, TARSHA TARRY was a resident of the County of Kings, State of New York.
3. This action is timely pursuant to CPLR 214-g.
4. At all times herein mentioned, defendant WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES was a religious corporation organized pursuant to the Religious Corporations Law, with its principal office at 1 Kings Drive, Tuxedo Park, NY in Orange County, New York.
5. At all times herein mentioned, defendant, KINGDOM HALL OF JEHOVAH'S WITNESSES, was a religious corporation organized pursuant to the Religious Corporations Law with its principal office 777 Albany Avenue, Brooklyn, NY 11203

6. At all times herein mentioned, defendant, KINGDOM HALL OF JEHOVAH'S WITNESSES, was a religious order within and under the authority of defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES.

7. At all times herein mentioned, defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, oversaw, managed, controlled, directed and operated, defendant, KINGDOM HALL OF JEHOVAH'S WITNESSES.

8. At all times herein mentioned, defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, managed, supervised and controlled those who were employed or otherwise worked for defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, including, but not limited to publisher and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES.

9. At all times herein mentioned, defendant, KINGDOM HALL OF JEHOVAH'S WITNESSES, managed, supervised and controlled those who were employed or otherwise worked for defendant, KINGDOM HALL OF JEHOVAH'S WITNESSES, including, but not limited to publisher and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, KINGDOM HALL OF JEHOVAH'S WITNESSES.

10. From on or about January 1, 1984 through on or about December 31, 1984, plaintiff, an infant, was under the care WORLD HEADQUARTERS OF JEHOVAH WITNESSES.

11. From on or about January 1, 1984 through on or about December 31, 1984, plaintiff was under the care of defendant, KINGDOM HALL OF JEHOVAH WITNESSES.

12. At all times herein mentioned and relevant to the allegations set forth herein

Jeffrey Miller, was a publisher assigned by defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, to defendant, KINGDOM HALL OF JEHOVAH WITNESSES

13. At all times herein mentioned and relevant to the allegations set forth herein, Jeffery Miller, was a publisher at defendant, KINGDOM HALL OF JEHOVAH WITNESSES.

14. At all times herein mentioned, Jeffrey Miller, was employed by defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES.

15. At all times herein mentioned, Jeffrey Miller was employed by the defendant, KINGDOM MALL OF JEHOVAH WITNESSES.

16. Through his position with defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, Jeffrey Miller, was put in direct contact with plaintiff, TARSHA TARRY, then an infant.

17. Through his position with defendant, KINGDOM HALL OF JEHOVAH WITNESSES, Jeffrey Miller, was put in direct contact with plaintiff, TARSHA TARRY, then an infant.

18. That on or about January 1, 1984 through December 31, 1984, Jeffrey Miller, sexually abused the plaintiff.

19. At all times herein mentioned, Jeffrey Miller, was under the management, supervision, employ, direction and/or control of defendant, WORLD HEADQUARTERS OF JEHOVAH WITNESSES.

20. At all times herein mentioned, Jeffrey Miller, was under the management, supervision, employ, direction and/or control of defendant, KINGDOM HALL OF JEHOVAH WITNESSES.

21. Defendants, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH WITNESSES, knew and/or reasonably should have known

and/or knowingly condoned and/or covered up, the inappropriate and unlawful sexual activities of Jeffrey Miller, who sexually abused the plaintiff, TARSHA TARRY, while plaintiff was an infant.

22. Defendant, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, had the responsibility to manage, supervise, control and/or direct publishers other personnel and volunteers assigned to defendant, WORLD HEADQUARTERS OF JEHOVAH WITNESSES.

23. Defendant, KINGDOM HALL OF JEHOVAH WITNESSES, had the responsibility to manage, supervise, control and/or direct publishers other personnel and volunteers assigned to defendant, KINGDOM HALL OF JEHOVAH WITNESSES.

24. At all relevant times, defendants, WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH WITNESSES, had a duty not to aid pedophiles such Jeffrey Miller, by assigning, maintaining and/or appointing him to positions in which he would have access to minors.

25. At all relevant times, Jeffrey Miller, used his position as a publishers to entice, take control of plaintiff, TARSHA TARRY, and sexually assault, sexually abuse or have sexual contact with plaintiff, TARSHA TARRY, while plaintiff was a minor.

26. Defendants, individually, jointly and/or severally, violated various New York statutes, including, but not limited to N.Y. Soc. Serv. Law §§413 and 420, which require school officials and teachers to report suspected cases of child abuse and impose liability for failure to report.

27. Plaintiff, TARSHA TARRY suffered physical and psychological injuries and damages as a result of her childhood sexual abuse by Jeffrey Miller.

28. As a direct result of defendants' conduct, plaintiff suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and physical manifestations of emotional distress. As a result of her childhood sexual abuse, plaintiff has been

prevented from obtaining the full enjoyment of life, has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling and has incurred and will continue to incur loss of income and/or loss of earning capacity.

29. Because of her childhood sexual abuse, plaintiff TARSHA TARRY is unable to fully describe all of the details of that abuse and the extent of the harm that she suffered as a result.

**AS AND FOR A FIRST CAUSE OF ACTION NEGLIGENCE HIRING, RETENTION,
SUPERVISION AND/OR DIRECTION**

30. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 29 as if fully set forth herein.

31. The sexual abuse of children by adults, including publisher and teachers, are foreseeable.

32. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, and KINGDOM HALL OF JEHOVAH WITNESSES at all relevant times represented and held out to the public WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH WITNESSES to be safe places for learning and participating in youth activities.

33. At all relevant times, defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH WITNESSES were each under an express and/or implied duty to protect and care for plaintiff, TARSHA TARRY.

34. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, negligently hired, retained, directed and supervised KINGDOM HALL OF JEHOVAH'S WITNESSES because they knew or should have known that Jeffrey Miller posed a threat of sexual abuse of children such as plaintiff.

35. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, and KINGDOM HALL OF JEHOVAH WITNESSES knew or should have known that Jeffrey Miller

had a propensity to engage in the conduct which caused plaintiff's injuries prior to or about the time of the occurrence of these injuries.

36. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, and KINGDOM HALL OF JEHOVAH WITNESSES owed a duty of care to all minors, including plaintiff, who were likely to come under the influence or supervision of Jeffrey Miller in their role as publisher, other personnel and volunteers to ensure that Jeffery Miller did not use his assigned positions to injure minors by sexual assault, sexual abuse or sexual contact with minors.

37. Defendant Jeffrey Miller sexually assaulted, sexually abused and/or had sexual contact with plaintiff Tarsha Tarry on Defendants' premises, including plaintiff TARSHA TARRY.

38. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES were put on notice of Jeffrey Miller's improper and inappropriate actions toward minors.

39. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES were negligent in failing to properly supervise Jeffrey Miller.

40. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES were negligent in failing to properly manage Jeffrey Miller.

41. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES were negligent in failing to properly control Jeffrey Miller.

42. At all relevant times, defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL of JEHOVAH'S WITNESSES were willful, wanton,

malicious, reckless and/or outrageous in their disregard for the rights and safety of plaintiff.

43. As a direct and proximate result of defendants' above described omissions, plaintiff has suffered and will continue to suffer the injuries described herein.

44. By reason of the foregoing, the Defendants are liable to plaintiff jointly, severally and/or in the alternative, for compensatory damages and punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SECOND CAUSE OF ACTION
NEGLIGENCE/GROSS NEGLIGENCE**

45. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 44 as if fully set forth herein.

46. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES knew or negligently failed to know that Jeffrey Miller posed a threat of sexual abuse to children.

47. The acts of defendant Jeffrey Miller as described above, were undertaken, enabled by, and/or during the course of his respective employment, assignment, appointment and/or agency with defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, and KINGDOM HALL OF JEHOVAH'S WITNESSES.

48. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES:

- a. gave improper or ambiguous orders or failed to make proper regulations, and/or employed improper persons in work involving risk of harm to others;
- b. failed to adequately supervise the activities of Kingdom Hall of Jehovah's Witnesses;

- c. failed to adequately supervise and safeguard minors attending World Headquarters of Jehovah's Witnesses;
- d. permitted and/or intentionally failed and/or neglected to prevent negligent or tortious conduct by persons, whether or not their servants, agents or employees, upon premises under their control; and
- e. allowed the acts of omission and/or commission of any or all of the allegations set forth in this Complaint to occur.

49. At all relevant times defendant Jeffery Miller was under the supervision, employ, direction and/or control of defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES.

50. At all relevant times, defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES were wanton, willful, malicious, reckless and outrageous in their disregard for the rights and safety of plaintiff, which conduct was equivalent to criminal conduct.

51. As a direct and/or indirect result of said conduct, Plaintiff has suffered injuries and damages as described herein.

52. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**THIRD CAUSE OF ACTION
BREACH OF FIDUCIARY DUTY**

53. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 52 as if fully set forth herein.

54. At all relevant times, there existed a fiduciary relationship of trust, confidence, and reliance between plaintiff, on the one hand. and defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES, on the other, based upon the entrustment of plaintiff, while she was a minor child, to the care and supervision of the defendants and each of them, as a parishioner, worshiper, invitee, attendee or guest at KINGDOM HALL OF JEHOVAH'S WITNESSES and as a student, invitee, attendee or guest at KINGDOM HALL OF JEHOVAH'S WITNESSES. The entrustment of the plaintiff to the care and supervision of the defendants and each of them, while plaintiff was a minor child, required the defendants to assume a fiduciary role and to act in the best interests of the plaintiff and to protect him while she was a minor and vulnerable child.

55. Pursuant to their fiduciary relationship with Plaintiff, defendants were entrusted with the well-being, care and safety of Plaintiff.

56. Pursuant to their fiduciary relationship with Plaintiff, defendants assumed a duty to act in the best interests of Plaintiff.

57. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES breached their fiduciary duties to plaintiff.

58. At all relevant times, the actions and/or inactions of WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES AND KINGDOM HALL OF JEHOVAH'S WITNESSES were willful, malicious, wanton, reckless and outrageous in their disregard for the rights and safety of plaintiff.

59. As a direct result of defendants' conduct, plaintiff has suffered injuries and damages described herein.

60. By reason of the foregoing, Defendants, jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together

with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**FOURTH CAUSE OF ACTION
BREACH OF NON-DELEGABLE DUTY**

61. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 60 as of fully set forth herein.

62. When she was a minor, plaintiff TARSHA TARRY was placed in the care of defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES for the purposes of providing plaintiff with a safe environment in which to participate in youth activities and receive an education. There was thus created a non-delegable duty of trust between plaintiff and defendants.

63. Plaintiff TARSHA TARRY was a vulnerable child when placed in the care of defendants World Headquarters of Jehovah's Witnesses and Kingdom Hall of Jehovah's Witnesses.

64. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES, and each of them, were in the best position to prevent plaintiff from being abused and/or to have learned of the repeated abuse by defendant Jeffrey Miller and to have stopped it.

65. As evidenced by the fact that plaintiff TARSHA TARRY was sexually abused as a minor child entrusted to the care of the defendants, these defendants breached their non-delegable duty to plaintiff.

66. At all relevant times, defendant Jeffrey Miller was under the supervision, employment, direction and/or control of defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES.

67. As a result of the sexually abusive conduct of defendant Jeffery Miller, plaintiff

TARSHA TARRY suffered the injuries and damages described herein, the full extent of which is unknown at present.

68. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**FIFTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

69. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 68 above as if set forth at length herein.

70. As described above, defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES acted in a negligent and/or grossly negligent manner.

71. The actions of defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES endangered plaintiff's safety and caused her to fear for her own safety.

72. As a direct and proximate result of the actions of defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, KINGDOM and HALL OF JEHOVAH'S WITNESSES, which included, but were not limited to, negligent and/or grossly negligent conduct, plaintiff suffered severe injuries and damages as described herein, including, but not limited to, mental and emotional distress.

73. By reason of the foregoing, Defendants, jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would

otherwise have jurisdiction.

**SIXTH CAUSE OF ACTION
BREACH OF DUTY *IN LOCO PARENTIS***

74. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 73 as if set forth at length herein.

75. While she was a minor, plaintiff was entrusted by her parents to the control of the defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES for the purposes of providing plaintiff with an education and allowing her to participate in youth activities sponsored by defendants. During the times that plaintiff was at school and during the times that she participated in youth activities, he was under the supervision and control of defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES. These defendants, and each of them, at all relevant times and now, owed and owe a duty to children entrusted their care to act *in loco parentis* and to prevent foreseeable injuries.

76. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES breached their duty to act *in loco parentis*.

77. At all relevant times the actions of defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES were willful, malicious, wanton, reckless, negligent, grossly negligent and/or outrageous in their disregard for the rights and safety of plaintiff.

78. As a direct result of defendants' conduct, plaintiff TARSHA TARRY has suffered the injuries and damages described herein.

79. By reason of the foregoing, defendants jointly, severally and/or in the alternative, are liable to plaintiff for compensatory damages, and for punitive damages, together with interest

and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**SEVENTH CAUSE OF ACTION
BREACH OF STATUTORY DUTY PURSUANT TO NEW YORK
SOCIAL SERVICES LAW §§ 413, 420 TO REPORT ABUSE**

80. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 79 as if fully set forth herein.

81. Pursuant to N.Y. Social Services Law §§413, 420, defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S WITNESSES had a statutory duty to report the reasonable suspicion of abuse of children in their care.

82. Defendants WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES, KINGDOM HALL OF JEHOVAH'S WITNESSES breached that duty by knowingly and willfully failing to report reasonable suspicion of abuse by Jeffrey Miller, of children in their care.

83. As a direct and/or indirect result of said conduct, plaintiff has suffered injuries and damages as described above.

84. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against defendants on each cause of action as follows:

- A. Awarding compensatory damages in an amount to be proven at trial, but in any event in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction;

- B. Awarding punitive damages to the extent permitted by law;
- C. Awarding prejudgment interest to the extent permitted by law;
- D. Awarding costs and fees of this action, including attorneys' fees, to the extent permitted by law;
- E. Awarding such other and further relief as to this Court may seem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Dated: Port Washington, New York
September 12, 2019

Yours, etc.



Brett A. Zekowski
Parker Waichman LLP
Attorneys for Plaintiff(s)
Office & Post Office Address
6 Harbor Park Drive
Port Washington, NY 11050
516-466-6500
Our File # 9006951

ATTORNEY'S VERIFICATION

STATE OF NEW YORK)

: ss :

COUNTY OF NASSAU)

Brett A. Zekowski, an attorney and counselor at law, duly admitted to practice in the Courts of the State of New York, affirms the following to be true under penalties of perjury:


I am an associate of the firm **Parker Waichman LLP** attorneys for the plaintiff(s) herein.

I have read the foregoing **SUMMONS AND COMPLAINT** and know the contents thereof. Upon information and belief, I believe the matters alleged therein to be true.

The source of your deponent's information and the grounds of my belief are communications, papers, reports and investigations contained in my file.

The reason this verification is made by deponent and not by plaintiff(s) is that plaintiff(s) reside in a county other than the one in which your deponent's office is maintained.

Dated: Port Washington, NY
September 12, 2019


Brett A. Zekowski

Index No.
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

TARSHA TARRY

Plaintiff,

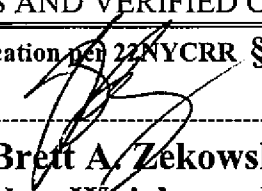
-against-

WORLD HEADQUARTERS OF JEHOVAH'S WITNESSES and KINGDOM HALL OF JEHOVAH'S
WITNESSES

Defendants.

SUMMONS AND VERIFIED COMPLAINT

Certification per 22 NYCRR §130-1.1a


Brett A. Zekowski
Parker Waichman LLP
Attorneys for Plaintiff(s)
6 Harbor Park Drive
Port Washington, NY 11050
(516) 466-6500

To:
Attorney(s) for

Service of a copy of the within is hereby admitted.

Dated:
Attorney(s) for

PLEASE TAKE NOTICE

NOTICE OF

ENTRY that the within is a (certified) true copy of a entered in the office of the Clerk of the within named
Court on 2019 .

NOTICE that an Order of which the within is a true copy will be presented to the Hon. , one of the
OF
SETTLEMENT judges of the within named Court, at ,
, on
2019, at M.

Dated: Port Washington, New York
September 12, 2019

Parker Waichman LLP
Attorneys for Plaintiff(s)